

**Grier, Gina**

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**From:** Tapp, Joshua  
**Sent:** Wednesday, March 27, 2013 5:33 PM  
**To:** Lear, Gary; Haeuber, Richard; Harvey, Reid; Wayland, Richard  
**Cc:** Weber, Rebecca; Jay, Michael; Grier, Gina; Kemp, Lachala  
**Subject:** FW: CASTNET

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**From:** R.W. Trewyn [<mailto:trewyn@k-state.edu>]  
**Sent:** Wednesday, March 27, 2013 4:58 PM  
**To:** Tapp, Joshua  
**Cc:** John Blair; John Briggs  
**Subject:** CASTNET

Dear Mr. Tapp:

The Konza Prairie Biological Station (KPBS) operated by Kansas State University on property owned by The Nature Conservancy (TNC) became a node in the Clean Air Standards and Trends (CASTNET) research and monitoring network in 2002, and we greatly value our research partnership with the EPA as part of this national network. Kansas State fully supports the CASTNET program goals of providing a consistent, decision-quality long-term data record of sulfur and nitrogen species dry deposition and measuring long term rural ozone concentration trends to assess national trends in air quality, atmospheric deposition, and ecological effects due to changes in air pollutant emissions. That was true in 2002; it's still true in 2013. This is consistent with the research, conservation, and educational goals of KPBS and with our mission as a National Science Foundation (NSF)-funded Long-Term Ecological Research (LTER) site.

However, I would like to raise a concern regarding the CASTNET ozone monitor at the KPBS site. As a university research site, it was disconcerting to learn that the status of the ozone monitoring activity at Konza was changed two years ago from a research only activity to add a regulatory monitoring component. Kansas State University was not aware of this change nor were we asked for our input. Clearly, such an alteration should have been discussed with us and the Kansas Department of Health and Environment (KDHE) before it was made.

At Kansas State, we have concerns about the long term impacts this change could have on our conservation goals in the Flint Hills region. All of the data we have obtained during the three-plus decades of our long-term research validate the use of prescribed fire as a tool to maintain and conserve the remaining tallgrass prairie habitat in the Central Plains. More recently when air quality issues came to light related to regional grassland burning, we worked with KDHE on the development of a Flint Hills Smoke Management Plan in an attempt to strike a balance between the conservation of prairie habitat and maintaining good air quality. We believe in bringing about change in range management practices through setting a positive example on Kansas State lands and our education programs. Having a regulatory monitor at the Konza site jeopardizes these goals.

Kansas State wishes to preserve the research efforts that have been underway at the Konza site for decades. We recognize the importance of the long term trends data to both EPA and to the KSU researchers at the Konza Prairie. At the same time, we cannot jeopardize our conservation efforts underway in the Flint Hills. Therefore, we are concerned about the impacts of continuing to operate the Konza ozone monitor as a regulatory activity, and we hope that we can find a way to maintain our participation in the CASTNET program without that burden.

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Please let me know if you or any of your colleagues at EPA would be available to discuss this matter. If so, I would like to involve two members of our Konza Prairie leadership team as well, John Blair (Konza Prairie LTER PI) and John Briggs (KPBS Director); both are copied on this message.

Thank you.

Sincerely,

Ron Trewyn

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